

## REMARKS

Applicant has carefully reviewed and considered the Office Action mailed on April 27, 2004, and the references cited therewith.

Claims 1-4, 6-8, 12, 13, 21, 25, 31, 34, 48, 55-58, 62, 63, 67 and 72 are amended; claims 78-84 are added; claims 1-77 remain pending in this application.

### §103 Rejection of the Claims

On page 3, item 5 of the April 27, 2004 non-final Office Action, claims 1-6, 13-14, 20-22, 25, 27-30, 34-37, 48-53, 55-58, 63, 64, 66-68, 72, and 74-77 were rejected under 35 U.S.C. §103(a) as being unpatentable over Aditham et al. (U.S. Patent No. 6,378,001) and Kumar et al. (U.S. Patent No. 6,342,906) in view of Jawahar et al. (U.S. Patent No. 6,298,356).

None of the Aditham et al., Kumar et al. and Jawahar et al. references alone or in combination disclose or suggest that *an existing client updates a new client* as now recited in the claims. The prior art discloses servers that serve a new user with session content. The cited England reference, previously applied to claims 8-12, 15-19, 23, 24, 38-40, 54, 60-62, 69 and 70, discloses a Hamelin system wherein user clients in a collaboration environment operate with the assistance of a guide client. The client of England “sends messages to the guide, receives messages from the guide, receives Web pages and/or Internet Resources *under control of the guide*, and/or engages in a collaborative conference (italics added)” according to col. 10, lines 43-46. The guide in England does not store objects and send them to a new user. Rather, the guide in England directs the clients to internet content, rather than sending the content itself stored in an existing user. The internet content in England is sent to the client from the server, not the guide. The present inventions use an existing client to send the content to a new client as illustrated in FIG. 11B and disclosed for example at page 49, lines 8-28 of the original specification. To improve reliability and cause simplicity, in the case of an alternate server, the alternate server of the present inventions does not need to have the White Board objects stored in it because an existing client will update a new client as claimed.

Applicant also wishes to point out that Applicant has not conceded that Kumar et al. disclose hyperlink objects. Because Kumar et al. has a broad recitation of objects, in the cited portion, without mentioning hyperlinks, does not mean they are necessarily disclosed or even inherent.

Also the new three-way combination of Aditham et al., Kumar et al. and Jawahar et al. would not have rendered active hyperlink objects as claimed. Such further combination with England neither discloses nor would suggest the inventions claimed.

Dependent claim 7 recites, for example, that a system administrator can “kill” a client as in the specification, for example, on page 19, line 4 and page 29, lines 17-23.

Dependent claims 12 and 62 now recite a freeze feature as in the specification, for example, on page 27, lines 6-14.

Accordingly applicant submits that the pending claims now patently distinguish over a combination of Aditham et al., Kumar et al. and Jawahar et al.

On page 7, item 28 of the April 27, 2004 Office Action, claim 7 was rejected under 35 U.S.C. §103(a) as being obvious over Aditham et al. (U.S. Patent No. 6,378,001) and Kumar et al. (U.S. Patent No. 6,342,906) and Jawahar et al. (U.S. Patent No. 6,298,356) as applied to claim 1 and further in view of Smythe et al. (U.S. Patent No. 6,418,214).

Smythe et al. do not disclose or suggest the claimed filtering step. Reconsideration and withdrawal of the rejection of claim 7 over Aditham et al., Kumar et al. and Jawahar et al. further in view of Smythe et al. is respectfully requested.

On page 8, item 30 of the April 27, 2004 Office Action, claims 8-12, 15-19, 23-24, 38-40, 45-47, 54, 60-62, and 69-70 were rejected under 35 U.S.C. §103(a) as being obvious over Aditham et al. (U.S. Patent No. 6,378,001), Kumar et al. (U.S. Patent No. 6,342,906) and Jawahar et al. (U.S. Patent No. 6,298,356) as applied to claims 1, 13, 21, 34, 48, 56, and 67 further in view of England (U.S. Patent No. 6,144,991).

England does not disclose or suggest the inventions claimed for the reasons discussed above. Reconsideration and withdrawal of the rejection of claims 8-12, 15-19, 23-24, 38-40, 45-

47, 54, 60-62, and 69-70 over Aditham et al., Kumar et al. and Jawahar et al. further in view of England is respectfully requested.

On page 10, item 41 of the April 27, 2004 Office Action, claims 26, 59, 65, 71, and 73 were rejected under 35 U.S.C. § 103(a) as being obvious over Aditham et al. (U.S. Patent No. 6,378,001), Kumar et al. (U.S. Patent No. 6,342,906) and Jawahar et al. (U.S. Patent No. 6,298,356) as applied to claims 25, 56, 63, 67 and 72 and further in view of Raz (U.S. Patent No. 6,292,827).

Raz does not disclose or suggest the claimed filtering step or structure or code permitting selective transmission of user generated objects including hyperlink objects by a server. Nor does Raz disclose or suggest filtered hyperlink objects. Reconsideration and withdrawal of the rejection of claims 26, 59, 65, 71, and 73 over Aditham et al., Kumar et al. and Jawahar et al. further in view of Raz is respectfully requested.

On page 11, item 47 of the April 27, 2004 Office Action, claims 31-33 were rejected under 35 U.S.C. § 103(a) as being obvious over Aditham et al. (U.S. Patent No. 6,378,001), Kumar et al. (U.S. Patent No. 6,342,906) and Jawahar et al. (U.S. Patent No. 6,298,356) as applied to claims 1 further in view of the WWW Conference article by Jacobs.

Independent claim 31 is drawn to “machine readable code stored in memory for converting a general purpose computer system into a dedicated White Board system facilitating collaboration between a plurality of users, the machine readable code generating ... a hyperlink connection tool for generating active hyperlink objects which are displayable at user-selected locations on the White Board screen ... and a filter device connecting all of the users and permitting selective transmission of the objects to the users.”

Since neither Aditham et al. nor Kumar et al. teach machine readable code for generating the filter specifically recited in claim 31 nor the filtered hyperlink objects, no combination of these references would have rendered the invention of claim 31 obvious. Moreover, since none of the additional references cited in item 48 of the Office Action teach or suggest this limitation, and are not cited as teaching such a filter device, no possible combination of the five cited references could render claim 31 obvious.

Reconsideration and withdrawal of the rejection of claims 31-33 over Aditham et al., Kumar et al. and Jawahar et al. and further in view of the Jacobs article is respectfully requested.

On page 12, item 53 of the April 27, 2004 Office Action, claims 41-44 were rejected under 35 U.S.C. §103(a) as being obvious over Aditham et al. (U.S. Patent No. 6,378,001), Kumar et al. (U.S. Patent No. 6,342,906) and England (U.S. Patent No. 6,144,991) as applied to claim 39 and further in view of Howell et al. (U.S. Patent No. 5,276,901).

This rejection is erroneous because there may have been an error since claim 39 was also rejected over Jawahar et al. (U.S. Patent No. 6,298,356) yet Jawahar et al. is not applied here to claims 41-44. For this reason alone the rejection of claims 41-44 should be withdrawn.

Nevertheless, independent claim 34 (from which claims 41-44 depend) recites "machine readable code stored in memory for converting a general purpose computer system into a dedicated White Board system facilitating collaboration between a plurality of users, the machine readable code generating ... a White Board server which operatively couples the first and the second White Board clients to one another, which selectively relays the first and the second objects including active hyperlink objects between the second and the first White Board clients, respectively, responsive to the first and second privilege levels, and which stores a White Board session in a White Board session file."

As discussed above, since neither Aditham et al. nor Kumar et al. teach machine readable code for generating the White Board server recited in claim 34, these references would not have rendered the invention of claim 34 obvious. Moreover, addition of England to the combination would not have rendered the invention of claim 34 obvious since all of the users of system taught by England receive identical information. The addition of Howell et al. teaches away from the invention recited in claim 34, since the proposed combination would result in a collaboration system where a single user with a high privilege level could receive an object or file from a partitioned storage, thus permitting everyone in the public session to see the object regardless of their respective privilege levels.

Reconsideration and withdrawal of the rejection of claims 41-44 over Aditham et al., Kumar et al. and England further in view of Howell et al. is respectfully requested.

Conclusion

Applicant respectfully submits that claims 1-77 and new claims 78-84 are in condition for allowance and notification to that effect is earnestly requested.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 50-0967.

Respectfully submitted,

ADAM J. SIMONOFF

By their Representatives,

Date

7/23/04

By

  
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